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October 7, 2024

### VIA ECF

The Honorable Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Rodriguez, Eneria v. Caridad Sea Food Restaurant Corp.  
Docket No.: 21-cv-6849  
Request for Extension of Time for Pretrial Submissions

Dear Judge Subramanian:

We write jointly on behalf of all parties to respectfully request a seven-day extension of the deadlines for pretrial submissions as outlined in the Court's Order. Specifically, the parties request that the deadlines currently set for **October 7, 2024**, be extended to **October 14, 2024**, and the deadline for oppositions to motions in limine from **October 14, 2024**, to **October 21, 2024**.

We acknowledge that this request is being submitted later than the Court's usual requirement of two business days in advance, and we sincerely apologize for this oversight. The need for an extension arose from the voluminous nature of the materials the parties are preparing, including jury instructions, verdict forms, the joint pretrial order, voir dire materials, and motions in limine. Each party has been working diligently to ensure thoroughness in their submissions; however, complexities and necessary discussions regarding potential stipulations to narrow the trial issues have necessitated additional time.

We believe that granting this extension will allow for a more comprehensive and well-considered presentation to the Court, ultimately benefiting the judicial process and conserving judicial resources. We also assure the Court that this request will not prejudice any party's rights or interests, as all parties consent to this request. Furthermore, the next scheduled appearance before the Court on **November 4, 2024**, at 2:00 PM, will remain unaffected.

This is the first request for an extension of these deadlines, and we appreciate the Court's understanding and consideration of this request.


Respectfully submitted,

By: /s/ Clifford Tucker  
Clifford Tucker, Esq.

The request for an extension is GRANTED. However, the parties should be aware that no further extensions will be granted, given the proximity to trial. And, given the extension, the Court expects the parties' submissions to be extremely thorough and the trial issues to have been narrowed to the fullest extent possible.

The Clerk of Court is directed to terminate the motion at Dkt. 106.

SO ORDERED.

  
Arun Subramanian, U.S.D.J.  
Dated: October 7, 2024